

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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*This document relates to: Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., Case No. 16-cv-07853.*

**PLAINTIFFS' NOTICE OF CORRECTION TO LLOYD'S SYNDICATE COMPLAINT**

On behalf of the plaintiffs in the above-referenced action, the undersigned counsel write to make a minor correction to the *Lloyd's Syndicate* Complaint originally filed in the United States District Court for the Western District of Pennsylvania (Case No 3:16-cv-00019), and recently transferred to this Court by order of the U.S. Judicial Panel on Multidistrict Litigation (ECF No. 3351). At ¶ 196 of the Complaint, plaintiffs assert that Yassin Abdullah Kadi "is an Executive Order 13224 Specially Designated Global Terrorist ("SDGT")." Mr. Kadi, a named defendant in a number of the lawsuits comprising *In re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570, was formally designated by the U.S. Treasury Department on October 12, 2001. However, Mr. Kadi's designation was later lifted by the Treasury Department on November 26, 2014. To reflect the change in Mr. Kadi's status as a SDGT, plaintiffs hereby withdraw the specific allegation in ¶ 196 without prejudice, and the *Lloyd's Syndicate* Complaint is corrected as follows:

196. Not long after making his \$270,000 contribution to Osama bin Laden, Khalid bin Mahfouz founded the Muwafaq Foundation in 1991, personally choosing Yassin Abdullah Kadi to help him manage the organization's operations. Al Kadi, an Executive Order 13224 Specially Designated Global Terrorist ("SDGT") from October 12, 2001 to November 26, 2014, was hired by bin Mahfouz to establish NCB's Islamic Banking Division.

The remainder of plaintiffs' allegations relating to Mr. Kadi in the *Lloyd's Syndicate* Complaint are unaffected by this correction.

Dated: October 14, 2016

Respectfully submitted,

/s/ Sean P. Carter

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